

**IN THE UNITED STATES OF AMERICA  
BEFORE THE UNITED STATES COURT OF APPEALS FOR THE  
DISTRICT OF COLUMBIA CIRCUIT**

<b>AMPERSAND PUBLISHING, LLC, D/B/A</b>	)	
<b><i>SANTA BARBARA NEWS-PRESS</i></b>	)	
	)	
<b>PETITIONER,</b>	)	
	)	<b>CASE No. 15-1074</b>
<b>v.</b>	)	
	)	
<b>NATIONAL LABOR RELATIONS BOARD</b>	)	
	)	
<b>RESPONDENT</b>	)	
	)	
<b>AND</b>	)	
	)	
<b>GRAPHICS COMMUNICATIONS CONFERENCE</b>	)	
<b>INTERNATIONAL BROTHERHOOD OF TEAMSTERS</b>	)	
	)	
<b>INTERVENOR</b>	)	
	)	

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**MOTION OF THE ZINSER LAW FIRM, P.C.  
TO WITHDRAW AS COUNSEL TO  
*SANTA BARBARA NEWS-PRESS***

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COMES NOW, the undersigned, pursuant to FRAP 27 and Circuit Rule 27, with this Motion to Withdraw as Counsel in the above-named and numbered action. The Zinser Law Firm, P.C., hereby moves to withdraw as counsel in the above-referenced appeal. The attorney-client relationship between The Zinser Law Firm, P.C. and Ampersand Publishing, LLC d/b/a

*Santa Barbara News-Press* has ended; The Zinser Law Firm, P.C. no longer represents *Santa Barbara News-Press*. The cessation of the attorney-client relationship is the reason for this motion.

The court should contact:

Don Katich  
*Santa Barbara News-Press*  
715 Anacapa Street  
Santa Barbara, California 93101  
Telephone No. 805.564.5261  
E-mail: dkatich@newspress.com

As officers of this court, we are obligated to inform you that Mr. Katich is not admitted to this court, nor is he a licensed attorney. The Zinser Law Firm, P.C. has explained to *Santa Barbara News-Press* that to proceed with this appeal in this court, *Santa Barbara News-Press* should be represented by an attorney admitted to practice before this court.

*Santa Barbara News-Press* has not directed The Zinser Law Firm, P.C. to take, or not take, any further action with respect to this appeal, thus The Zinser Law Firm, P.C. files this Motion to Withdraw as Counsel.

WHEREFORE, The Zinser Law Firm, P.C. respectfully moves to withdraw as counsel to *Santa Barbara News-Press* in the above-referenced case.

DATED: July 17, 2015

Nashville, Tennessee

Respectfully submitted,

/s/ L. Michael Zinser  
L. Michael Zinser

/s/ Glenn E. Plosa  
Glenn E. Plosa

**THE ZINSER LAW FIRM, P.C.**  
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Facsimile: (615) 244-9734

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing MOTION TO WITHDRAW AS  
COUNSEL was filed electronically with the Court's CM/ECF system and  
served upon the following this 17<sup>th</sup> day of July, 2015:

Mark Langer, Clerk  
U.S. Court of Appeals for the District of Columbia Circuit  
333 Constitution Avenue, Northwest  
Washington, D.C. 20001

Julie Broido  
Linda Dreeben  
Micah Jost  
National Labor Relations Board  
1099 14<sup>th</sup> Street, N.W.  
Washington, D.C. 20570

Ira L. Gottlieb  
Bush Gottlieb Singer Lopez Kohanski Adelstein & Dickinson  
500 North Central Avenue, Suite 800  
Glendale, CA 91203

And upon the following as listed below:

Don Katich  
*Santa Barbara News-Press*  
715 Anacapa Street  
Santa Barbara, CA 93101  
(Via e-mail @ dkatich@newspress.com and FedEx)

/s/ Glenn E. Plosa  
Glenn E. Plosa